

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,  
v.  
BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,  
Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,  
v.  
S&L PARTNERSHIP, a New York partnership,  
CARLA GOLDWORM, TRUST FOR THE  
BENEFIT OF SAMUEL GOLDWORM, a New York  
trust, SAMUEL GOLDWORM, as trustee and as an  
individual, TRUST FOR THE BENEFIT OF LUKE  
GOLDWORM, a New York trust, and LUKE  
GOLDWORM, as trustee and as an individual,

Adv. Pro. No. No. 10-04702 (SMB)

Defendants.

**STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION**

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including May 31, 2018.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

**[THIS PORTION IS INTENTIONALLY LEFT BLANK]**

Dated: March 6, 2018  
New York, New York

Of Counsel:

**BAKER & HOSTETLER LLP**  
11601 Wilshire Boulevard, 14<sup>th</sup> Floor  
Los Angeles, California 90025-0509  
Telephone: 310.820.8800  
Facsimile: 310.820.8859  
Michael R. Matthias  
Email: [mmatthias@bakerlaw.com](mailto:mmatthias@bakerlaw.com)

**BAKER & HOSTETLER LLP**

By: s/ Nicholas J. Cremona  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: 212.589.4200  
Facsimile: 212.589.4201  
David J. Sheehan  
Email: [dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)  
Nicholas J. Cremona  
Email: [ncremona@bakerlaw.com](mailto:ncremona@bakerlaw.com)

*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L.  
Madoff*

**DENTONS US LLP**

By: s/ Carole Neville  
1221 Avenue of the Americas  
New York, New York 10020  
Telephone: 212.768.6889  
Facsimile: 212.768.6800  
Carole Neville  
Email: [carole.neville@dentons.com](mailto:carole.neville@dentons.com)

*Attorneys for Defendants*

s/ Allen G. Kadish  
Allen G. Kadish, Mediator